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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Defendants’ Opposition to Waymo’s Motion For Leave to File Amended List of Elected Trade Secrets, Supplemental Expert Reports, and Revised Witness and Exhibit Lists (“Opposition”). Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Highlighted Portions	Plaintiff (Green)
Burnette Declaration	Entirety	Defendants Plaintiff
Chang Declaration Exhibits 1, 2, 3, 5, 9, 10, and 11	Entirety	Plaintiff (Green)

A portion of the Burnette Declaration contains highly confidential technical information relating to a portion of Ottomotto’s source code, including an excerpt from that code. Defendants have kept this source code confidential, and disclosure of this source code would harm Defendants’ competitive standing. (Yang Decl. ¶ 3.)

The green-highlighted portions of the Opposition, and the entirety of the Burnette Declaration and Chang Declaration Exhibits 1, 2, 3, 5, 9, 10, and 11 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on October 25, 2017.

1 For the foregoing reasons, Defendants request that the Court enter the accompanying
2 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and
3 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
4 ATTORNEYS' EYES ONLY."

5 Dated: October 25, 2017

MORRISON & FOERSTER LLP

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7 By: /s/ Michael A. Jacobs

MICHAEL A. JACOBS

8 Attorneys for Defendants
9 UBER TECHNOLOGIES, INC. and
10 OTTOMOTTO LLC
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